

13 A. — certain enhanced service providers,

14 information service providers.

15 Q. What are the products that typically are sold to

16 these customers?

17 A. We sell a variety of certain access products

18 which are primarily used in the interexchange carrier

19 industry, as well as basic exchange products, such as coin

20 telephone lines, other data type services, depending on

21 the individual customer.

22 Q. The position you currently have, communications

23 management service vice president?

24 A. Yes.

25 Q. And that's in the industry market group?

0008

1 A. Right.

2 Q. As vice president, you report to the president

3 of the industry market group?

4 A. Yes, I do.

5 Q. And that would be Ms. Fetter, F-e-t-t-e-r?

6 A. Yes, it is.

7 Q. And you have held this assignment since 1994,

8 December?

9 A. Right.

10 Q. At the time that you took this position, were

11 you the only vice president of communication management

12 services?

13 A. Yes, I was.

14 Q. Is that still the case?

15 A. Yes, it is.

16 Q. You mentioned some of the products that you are  
17 responsible for selling.

18 A. Yes.

19 Q. Did you mention resale of local exchange  
20 service?

21 A. I am not currently responsible for the resale  
22 products. That's not part of my organization. I am  
23 affiliated with the interconnection products.

24 Q. When you say, I am not currently responsible for  
25 the resale of products, have you ever been?  
0009

1 A. Yes. I was in 1995.

2 Q. When did you cease being responsible?

3 A. January of '96 -- pardon me, January of '97.

4 Q. January of '97, so you had responsibility  
5 from -- when did Pacific Bell start reselling local  
6 service, do you know?

7 MR. KOLTO-WININGER: You may know where he is  
8 going often, but let him finish the question, just so she  
9 can take down both full statements.

10 THE WITNESS: I need to correct a statement.  
11 Can I?

12 MR. ETtinger: Why, sure.

13 THE WITNESS: I said 1995. I meant 1996 on the  
14 resale side of it. That was the last year that I was  
15 involved in the resale products. I think I --

16 MR. ETtinger: Q. You said '95, then '96, and

17 then you said '97. Why don't we start over on that.

18 MR. KOLTO-WININGER: Start date and end date.

19 MR. ETtinger: Q. When did resale of local  
20 service, and that's what I am talking about, become a  
21 product that Pacific offered?

22 A. It was originally tariffed in March of 1996.

23 Q. And so were you ever responsible for that?

24 A. Yes, I was.

25 Q. When did you cease being responsible?  
0010

1 A. January '97.

2 Q. Of this year?

3 A. Right, yeah.

4 Q. So from its outset in March of '96 until January  
5 of '97, I take it that somebody else took over that  
6 responsibility?

7 A. Yes, they did.

8 Q. Who would that be?

9 A. That would be John Stankey.

10 Q. And that's S-t-a-n-k-e-y?

11 A. K-e-y.

12 Q. He is also a vice president in the industry  
13 markets group?

14 A. Yes, he is.

15 Q. Now, you said Pacific first tariffed resale of  
16 local service in March of '96. I take it that the  
17 planning for reselling began prior to that time?

18 A. Yes.

19 Q. Can you recall when that was, approximately, if  
20 you don't know the precise date?

21 A. I am not sure when the planning for it started.

22 Q. When did you become involved in the planning?

23 A. In 1996.

24 Q. Before March?

25 A. Yes, yes.

0011

1 Q. Roughly the beginning of '96?

2 A. Right.

3 Q. Now, in addition to the resale of local service,

4 you said, I think, you were also responsible for the

5 interconnection?

6 A. Uhm-hum, yes.

7 Q. By that, do you mean interconnection between

8 customers at Pacific who are seeking resale local service

9 and Pacific?

10 A. Yes.

11 Q. If you are unhappy with my definition, please

12 expand it or explain it any way you feel --

13 A. It's the interconnection of other local service

14 providers' networks with ours.

15 Q. And part of the interconnection that you're

16 referring to is so that other local service providers

17 seeking to resell Pacific services can effectively order

18 services; is that not true?

19 A. Well, I don't know if I -- I think -- I don't

20 clearly understand your question.

21 Q. Okay. You mentioned the interconnection of the  
22 networks. One of the purposes of that interconnection is  
23 for the ordering of resale of local service from Pacific;  
24 is that correct?

25 A. The interconnection of the -- the  
0012  
1 interconnection of their networks with ours is so that we  
2 can move traffic from one network to another between our  
3 networks.

4 Q. So you are talking about interconnection in the  
5 sense of completing telephone calls?

6 A. In moving telephone calls between the networks,  
7 yeah.

8 Q. I guess -- so that's what you meant by  
9 interconnection?

10 A. Right.

11 Q. How about automated processes for ordering  
12 services from Pacific, was that one of your  
13 responsibilities?

14 A. I didn't -- again, I don't know. Can you  
15 clarify your question?

16 Q. Sure.

17 A. As far as responsibilities.

18 Q. Let me ask this. Are you familiar with  
19 something, I believe it's an office at Pacific called the  
20 LISC, and I believe that's for the Local Interconnection  
21 Service Center?

22 A. Yes, I am familiar with that.

23 Q. Were you responsible for that operation?

24 A. In 1996.

25 Q. Was one of the functions of the LISC to take

0013

1 offers from local service competitors of Pacific seeking

2 to resell local service?

3 A. Yes, it was.

4 Q. And one of the functions is to issue, if I

5 recall, order commitments known as FOC's, to the customers

6 of Pacific?

7 A. Yes, it is.

8 Q. I take it from your answer you no longer are

9 responsible for the LISC; is that correct?

10 A. I am no longer -- yes, I am no longer

11 responsible for the resale at LISC.

12 Q. Is there another LISC?

13 A. There is a -- yes, there is another LISC that

14 handles interconnection services.

15 Q. This is completely a separate office,

16 physically?

17 A. Physically, it's -- I don't know what you mean

18 by a separate office.

19 Q. Let me ask the question in a different way.

20 Where is the LISC located?

21 A. Located at the -- which LISC are you speaking

22 of?

23 Q. I am trying to determine if there's more than

24 one. The one that deals with the resale of local exchange

25 service.

0014

1 A. Located at 370 Third Street, primarily.

2 Q. Now, the second LISC that you mentioned, where  
3 is that located?

4 A. That's also located at 370 Third Street.

5 Q. Both LISC's are on the same floor, in the same  
6 building?

7 A. They are on the same floor, yes.

8 Q. Are they physically separated in any way?

9 A. Yes, they are.

10 Q. They have different supervisors?

11 A. Yes, they do.

12 Q. But they both have the same name?

13 A. Yes, they do. We qualify one as the LISC for  
14 resale, and the other is the LISC for interconnection for  
15 facilities based, is what they call it.

16 Q. For purposes of this discussion, then, so I  
17 don't trip over myself, how should we best -- let's agree  
18 on a way to refer to them, the LISC for resale, let's call  
19 that the LISC-R.

20 A. Fine.

21 Q. And the LISC for facilities based  
22 interconnection --

23 A. Right.

24 Q. -- let's just call that the LISC-F for  
25 facilities.

0015

1 A. Fine, fine.

2 Q. Let me see if I understand this. You used to be  
3 responsible until January of this year for both?

4 A. That's correct.

5 Q. LISC-R and -F?

6 A. That's correct.

7 Q. But beginning in January, Mr. Stankey took over  
8 the responsibility for the LISC-R?

9 A. Yes, he did.

10 Q. And you maintained responsibility for the  
11 LISC-F?

12 A. Yes, I did.

13 Q. I am going to show you a document that has been  
14 previously marked, I believe your attorney has a copy, as  
15 deposition Exhibit 3. This is a document that's a letter  
16 from Caryn Moir, M-o-i-r, to Robert Ulrich at AT&T. Do  
17 you have this document in front of you?

18 A. Yes, I do.

19 Q. Why don't you take some time to just read it and  
20 familiarize yourself with it.

21 A. All right.

22 Q. Now, this document is from October of 1996,  
23 which, if I understand your testimony, was at a time that  
24 you were responsible for the LISC, dealing with resale,  
25 correct?

0016

1 A. Correct.

2 Q. Now, the rest of my -- now the questions I am  
3 going to ask you only deal with the LISC that has to do



4 with resale, and because these letters don't — this  
5 letter and some others that I am going to show you don't  
6 break the LISC down to resale versus facilities, I am just  
7 going to use the term LISC as it's used in these letters.

8 Just so that we understand, I am just talking  
9 about the resale function now, okay? And if I am going to  
10 change that, I will let you know so we can discuss it.  
11 But if you have any question about what I am talking  
12 about, please stop me and seek clarification, okay?

13 A. All right.

14 Q. I will ask you first, have you ever seen this  
15 letter before?

16 A. Yes, I have.

17 Q. When was the first time you saw it?

18 A. When I was reviewing — I believe it was when I  
19 reviewed the AT&T — one of the AT&T documents. I think  
20 it was your filing.

21 Q. Are you referring to the complaint?

22 A. The complaint, yes, excuse me.

23 Q. So prior to AT&T's filing — just for the  
24 record, this was attached to our complaint, to AT&T's  
25 complaint?

0017

1 A. Right.

2 Q. So you had not seen it prior to that time?

3 A. Not that I can recall.

4 Q. You do know who Caryn Moir is, or do you?

5 A. Yes, I do.

6 Q. For the record, would you state what her job was  
7 at this time?

8 A. She was a director on the AT&T account team that  
9 has part of the responsibilities -- that had resale  
10 responsibilities.

11 Q. Now, in this letter, Ms. Moir makes certain  
12 statements about Pacific's performance of the LISC and its  
13 ability to meet the interval for issuing Firm Order  
14 Commitments within an agreed upon -- previously agreed  
15 upon four-hour interval; is that not right?

16 A. Correct.

17 Q. And let me first ask you, you are aware at this  
18 time that -- at the time of the letter that Pacific had  
19 previously agreed to issue Firm Order Commitments within  
20 four hours?

21 A. Yes, I am.

22 Q. And the letter states that -- I am looking at  
23 the fifth line down in the first paragraph -- that, "At  
24 that time, Pacific was issuing FOC's not within four hours  
25 but approximately 48 to 72 hours." Do you see that?

0018

1 A. Yes.

2 Q. Do you have any opinion about whether that's a  
3 correct or incorrect statement?

4 A. I do not know if that number is absolutely  
5 correct, but the general statement that it was longer than  
6 four hours is a correct statement.

7 Q. Do you have any idea -- you say you don't know

8 whether the 48 to 72 hours is correct?

9 A. I am not sure what data that was based on or

10 what period of time, other than --

11 Q. It could have been less than 48 hours?

12 A. Yes, it could have been.

13 Q. Or it could have been more than 72?

14 A. Yes, it could have been.

15 Q. Do you have any -- if you were to put a -- let

16 me rephrase that.

17 Are you able to put an estimate as to the number

18 of hours that it took, approximately, at that time, as

19 this letter --

20 MR. KOLTO-WININGER: As of that date?

21 MR. ETTINGER: As of that date, yes.

22 MR. KOLTO-WININGER: Don't guess. If you have

23 some rational reason to know, then estimate it.

24 THE WITNESS: I do not know what the interval

25 would have been at that point in time, the date of this  
0019

1 letter.

2 MR. ETTINGER: Q. Do you have any reason to

3 doubt the correctness of this estimate?

4 A. No, I do not.

5 Q. Do you know Ms. Moir?

6 A. Yes, I do.

7 Q. She was not responsible, was she, in her job for

8 issuing -- or responsible for the time that it took to

9 issue FOC's, was she?

10 MR. KOLTO-WININGER: Objection. Vague. Go  
11 ahead.

12 THE WITNESS: No, she wasn't.

13 MR. ETTINGER: Q. So to make a statement like  
14 this, she would have either had to just make it up or  
15 check with somebody who was responsible?

16 MR. KOLTO-WININGER: Objection. Lacks  
17 foundation; calls for speculation, but go ahead.

18 THE WITNESS: I would assume she did.

19 MR. ETTINGER: Q. She didn't check with you, to  
20 the best of your knowledge?

21 A. No, she did not.

22 Q. She may have checked with somebody who reported  
23 to you.

24 MR. KOLTO-WININGER: Objection. Lacks  
25 foundation; calls for speculation, but go ahead and  
0020  
1 answer.

2 THE WITNESS: Possibly.

3 MR. ETTINGER: Q. Do you remember anybody at  
4 this time -- I'm trying to get a question here that you  
5 won't object to, see if I can.

6 Do you remember, at this time, anybody who  
7 reported to you discussing this issue with you? I think  
8 that's unobjectionable.

9 A. Discussing which issue?

10 Q. So I got an objection from the witness. I will  
11 try again.

12        Discussing the issue of whether Pacific was  
13 issuing Firm Order Commitments within 48 to 72 hours.

14    A. I had no discussions with anybody in my  
15 organization regarding the range of time for FOC's.

16    Q. You did state earlier, did you not, that you did  
17 know that, at that time, Pacific was not issuing Firm  
18 Order Commitments within the four-hour period?

19    A. Yes.

20    Q. How do you know that?

21    A. Because we had -- at that point, did not have a  
22 process in place to be able to deliver the FOC in four  
23 hours.

24    Q. Do you know, does Pacific currently have a  
25 process in place to be able to deliver a FOC in four  
0021  
1 hours?

2    A. That question would be more appropriate to be  
3 asked of the people that are currently in charge of the  
4 resale LISC.

5    Q. That would be Mr. Stankey?

6    A. Yes.

7    Q. So your answer, then, is you don't know?

8    A. No, I do not.

9    Q. The next sentence states that Ms. Moir is  
10 "Personally working with the managers in the LISC." Do  
11 you see that?

12    A. Uhm-hum.

13    Q. Who would that be? Do you know who would the

14 managers of the LISC be at that time? They would report  
15 to you, right?

16 A. Right. That could be --

17 MR. KOLTO-WININGER: I am going to object to  
18 calls for speculation, but I think you just want to know,  
19 not what she meant, but --

20 Let's go off the record.

21 (Discussion off the record.)

22 MR. ETTINGER: Q. Just so the question is  
23 clear, I am not asking you to speculate what Ms. Moir may  
24 have meant, but I am trying to understand what the chain  
25 of command was of the managers who reported to you.

0022

1 A. All right.

2 Q. Who would the manager of the LISC be at that  
3 time, if there was such a person?

4 A. There were a number of managers at different  
5 levels involved with the LISC.

6 Q. Well, maybe we could take it from the top down,  
7 from yourself.

8 A. Okay.

9 Q. Who would directly report to you that had  
10 responsibility for the LISC?

11 A. Jeff Phelps, P-h-e-l-p-s.

12 Q. What was his title?

13 A. Executive director, customer service centers. I  
14 believe that's his official title.

15 Q. And reporting to Mr. Phelps, who would be the

18 Q. Who did he report to, which one of your peers  
19 did he report to?

20 A. Joan Brown.

21 Q. At that time, were you -- did you work with  
22 Mr. Torretta and Ms. Brown in serving the systems  
23 necessary to operate the LISC in Pacific's commitments in  
24 meeting firm orders?

25 A. Indirectly, I'd say.

0024

1 Q. Could you explain what you mean by indirectly?

2 A. I did not work with them on a regular basis  
3 day-to-day on the systems associated with the LISC.

4 Q. Let me understand. You were responsible for the  
5 performance of the LISC at that time, right?

6 A. Yes.

7 Q. And in order for the LISC to perform well, there  
8 had to be -- it had to use various systems?

9 A. Correct.

10 Q. And was there a way in which you and Ms. -- was  
11 it Brown?

12 A. Brown.

13 Q. Ms. Brown's organization met to ensure that the  
14 systems could be integrated within the LISC?

15 A. We had some meetings concerning systems in the  
16 LISC.

17 Q. Did your staff meet regularly with Ms. Brown's  
18 staff?

19 A. Yes, they met more frequently.

20 Q. Were you kept apprised by your staff as to the  
21 work that was being done to your systems to improve their  
22 performance?

23 A. In general terms, yes.

24 Q. What do you mean by "in general terms?"

25 A. Again, I didn't work with the systems  
0025  
1 development and implementation on a day-to-day regular  
2 basis.

3 Q. You are not an expert in systems development?

4 A. No, I am not.

5 Q. So if somebody had a coding problem, they  
6 wouldn't come to you to say, how do I do this, correct?

7 A. That's correct.

8 Q. But you were responsible for making sure that  
9 the LISC was functioning properly?

10 A. Yes, I was.

11 Q. And you realized or knew, did you not, that, to  
12 function properly, it required various systems which had  
13 to be worked on?

14 A. Yes, I did.

15 Q. So was one of your concerns making sure that  
16 people were actually working on the systems?

17 A. Yes, it was.

18 Q. Do you recall any discussion you ever had with  
19 Ms. Brown, or anybody who worked for Ms. Brown, about  
20 whether they had adequate resources in order to do the  
21 systems work that was necessary?



22 A. No, no specific discussions about adequate  
23 resources.

24 Q. Do you recall Ms. Brown or her organization ever  
25 indicating to you that they felt that they did not have  
0026  
1 adequate resources to fulfill their mission?

2 A. There were discussions around resources and  
3 prioritizations on work activities.

4 Q. What were those discussions?

5 A. Well, I wasn't involved in the discussions. You  
6 asked me if I was aware of discussions. I thought that  
7 was your question.

8 Q. These weren't discussions that you had, these  
9 were discussions that some of your people had with some of  
10 Ms. Brown's people; is that what you're saying?

11 A. That could be possibly one of the cases, yes.

12 Q. But I think my question was, are you aware of  
13 any statements by anybody in Ms. Brown's organization or  
14 Ms. Brown that there were inadequate resources devoted for  
15 her to complete her mission?

16 A. No.

17 Q. Now, go on, if you would, to the next sentence  
18 where it says, "Some of the problems that we have  
19 identified are," and do you see that?

20 A. Uhm-hum.

21 Q. She identifies four problems. I want to go over  
22 them with you one at a time. The first is universal  
23 staffing in the LISC, and as I recall, and your counsel

24 can correct me if I'm wrong, when I asked Ms. Moir what  
25 she meant by universal staffing, she meant that employees  
0027  
1 who were in the LISC were not, at that time, specialists,  
2 devoted to either a particular client or particular  
3 function. They were asked to perform many tasks and so,  
4 universal. So do you understand what she means by that  
5 now?

6 A. I understand what you described.

7 Q. With that understanding, do you agree that, at  
8 that time, universal staffing in the LISC was a problem?

9 A. We had universal staffing in the LISC, as you've  
10 defined it. I don't -- I would not describe that as a  
11 problem.

12 Q. The fact it was universal staffing in the LISC,  
13 did that make the employees less efficient?

14 A. That could.

15 Q. Is there still universal staffing in the LISC or  
16 has the LISC moved to have employees who are more  
17 specialized?

18 A. Again, I cannot answer for today. That question  
19 would be more appropriately asked of John Stankey.

20 Q. How about between October 22nd, and -- when did  
21 you cease to have responsibility for the LISC?

22 A. In January of this year.

23 Q. When in January, do you remember?

24 A. I do not remember the exact date.

25 Q. Was it mid-January, January --

0028

1 A. Early January.

2 Q. How about by late December of '96, two months

3 after this letter, was there still a good deal of

4 universal staffing in the LISC or had employees become

5 more specialized?

6 A. We had made some changes in the work functions.

7 Q. And were those changes more to specialized

8 employees?

9 A. Tried to specialize some of the tasks, right.

10 Q. So you moved away from, at least at the time you

11 are familiar with, you moved away from the universal

12 staffing in the LISC?

13 A. Yes.

14 Q. So while you don't agree that it was necessarily

15 a problem, Pacific Bell, at least during the time that you

16 are familiar with, has changed its approach?

17 A. Yes, we did.

18 Q. All right. The next statement has to do with

19 inadequate staffing in the LISC. I think that's pretty

20 obvious what that means. Do you agree that, at the time,

21 there was inadequate staffing in the LISC?

22 A. Yes, we had job openings in the LISC at that

23 time.

24 Q. How many job openings, do you recall?

25 A. I don't recall the exact number.

0029

1 Q. Do you know about how many -- how large the LISC

2 was at that time, management, non-management?

3 A. Which LISC are you speaking of?

4 Q. We are talking about the LISC for resale.

5 A. Resale, the staff was approximately a hundred  
6 people.

7 Q. And the openings -- you say you don't recall how  
8 many -- let me strike that.

9 When you say a hundred people, there were a  
10 hundred positions of which some were empty or a hundred  
11 people were actually working there?

12 A. There was actually a hundred people working  
13 there.

14 Q. I know you said you don't remember how many open  
15 positions, but it was more than a hundred open positions  
16 at that time?

17 A. Yeah, I don't know the exact number. We were  
18 issuing requisitions to add people during that period of  
19 time, so I don't know the precise number. But there were  
20 open requisitions.

21 Q. I am looking for an approximate number. More  
22 than 10?

23 A. I would say more than a hundred.

24 Q. More than a hundred openings?

25 A. Uhm-hum.  
0030

1 Q. Do you recall when these 100 -- these more than  
2 100 openings were filled?

3 A. They were being filled in the November and  
4 December time frame and into January.

5 Q. When you ceased having responsibility?

6 A. Yes.

7 Q. So into January, there were still openings?

8 A. Yes.

9 Q. Did you add more positions which needed to be  
10 filled between October and the time you left? Do you  
11 understand my question?

12 A. No, I don't understand your question.

13 Q. Let me kind of just give you a hypothetical.

14 I think you stated that around October there  
15 were a hundred employees working at the LISC?

16 A. Right.

17 Q. Approximately?

18 A. Approximately.

19 Q. And that, at that time, there were a hundred  
20 plus openings?

21 A. Approximately.

22 Q. So let's just use a hundred openings, just --

23 A. All right.

24 Q. So that means we have 200 positions, of which  
25 100 are filled and 100 are open.

0031

1 A. Right.

2 Q. And you indicated to me that, during the period  
3 from October 22nd until the end of the year, you were  
4 filling those 100 positions?

5 A. That's correct.

6 Q. They hadn't all been filled?

7 A. That's true.

8 Q. What I am asking you is, did, at that time, you  
9 decide that the right -- the number of employees was  
10 greater than 200, instead of adding 100 we should have  
11 added 150 or 200? Do you understand that?

12 A. Yes.

13 Q. I am not asking you to agree with those numbers  
14 but the concept.

15 A. We were continually assessing our force  
16 situation versus load that was coming in, and during that  
17 time, we also brought in contract help into the work flow.

18 During that time, we also trained additional  
19 service representatives to help on a part-time basis with  
20 working a load. So we were trying, at that time, to  
21 expand our force to meet the current load and be able to  
22 stay current with the work.

23 Q. That's what you were doing to meet the demand  
24 during that period, but what I am asking is, did you also,  
25 during that period, make a determination that you needed  
0032

1 to add even more positions than you had estimated back in  
2 October?

3 A. We did not open up any additional requisitions  
4 during that time.

5 Q. What do you mean by requisitions, job  
6 requisitions?

7 A. Job requisitions for additional people.

8 Q. You did not, between the October period and the

9 time that Mr. Stankey took over?

10 A. Other than the hundred and something we had  
11 opened and were attempting to fill, to the best of my  
12 recollection, we didn't issue any new ones.

13 Q. And if any new ones have been issued since, you  
14 do not know?

15 A. I do not have personal knowledge of that.

16 Q. Just so I'm clear on this, the time you left,  
17 between the October 22nd date when you estimated you had a  
18 hundred plus jobs to fill and the time you left the job --  
19 you didn't leave the job -- at the time this  
20 responsibility was transferred to Mr. Stankey, can you  
21 estimate approximately how many of these jobs, under 100  
22 plus jobs, were filled?

23 A. I believe we had filled -- I don't -- I don't  
24 have a good feel for what that number exactly was. I  
25 can't give you a number.

0033

1 Q. If you look down the letter, the bullet points  
2 that are indented --

3 A. Yes.

4 Q. Ms. Moir, under the heading, "Increased  
5 Resources," says, "The LISC will grow from approximately  
6 50 employees to 150 in November." She apparently was  
7 using a number that you had 50 employees in October, and I  
8 think you just told me you had a hundred.

9 So if she used the number 50, she was incorrect  
10 there, or does that refresh your recollection that maybe

11 the number was closer to 50 at that time?

12 A. No. I believe the number was closer to a  
13 hundred. I am not sure what she was referring to as 50  
14 employees in the LISC.

15 Q. Let's go back up to the sentence that I was at  
16 where she was identifying -- where what she referred to as  
17 the problem, and the fourth one was fully manual order  
18 processing. Do you know what that references, that  
19 phrase?

20 MR. KOLTO-WININGER: Objection. Calls for  
21 speculation.

22 MR. ETTINGER: I will rephrase the question.

23 Q. She references the phrase, uses the phrase,  
24 fully manual order processing.

25 A. Uhm-hum.  
0034

1 Q. Does that mean to you that, at that time, the  
2 LISC was actually inputting everything manually.

3 MR. KOLTO-WININGER: Objection. Calls for  
4 speculation, but go ahead and answer.

5 THE WITNESS: The majority of the orders were  
6 coming in varying formats, some electronically, some on  
7 paper, fax, Fed-Ex'd packages, different forms. They'd  
8 all require some form of manual processing in order to get  
9 them into the process, and to perform the functions that  
10 were required to migrate the services.

11 MR. ETTINGER: Q. Do you know how AT&T was  
12 inputting its orders at that time?



13 A. They were inputting their orders electronically.

14 Q. So it's a fact that, even though AT&T put in its  
15 orders electronically, that those electronic orders  
16 terminated either on a screen or a piece of paper, and a  
17 Pacific Bell employee then had to retype all that manually  
18 into Pacific Bell's system?

19 A. Yes, that's true.

20 Q. And finally, the last point is, "Inconsistent  
21 flow through NDM." Do you know what NDM means?

22 A. Yes, I know what NDM is.

23 Q. Could you state it for the record.

24 A. It's Network Data Mover.

25 Q. Your opinion, was there inconsistent flow  
0035

1 through the NDM?

2 A. I am not sure what she means by inconsistent  
3 flow. I can't answer that.

4 Q. Now, going to the next paragraph, after the  
5 bullet points, the bullet points indicating certain  
6 changes that -- let me go back up to those bullet points,  
7 which Ms. Moir refers to as a gap closure plan.

8 The first is, "Dedicated Resources. The LISC  
9 staff will be divided by account." Do you know if that  
10 was accomplished?

11 A. For a period of time, there was some assignment  
12 award, primarily for certain representatives for certain  
13 customers.

14 Q. What was that period of time?